

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

HANNAH CRAMER

PLAINTIFF,

v.

Case No. 3:18-cv-00039

ARKESIA, INC. d/b/a CLUB ROUGE,

DEFENDANT.

MOTION TO DISMISS AND MOTION TO STRIKE

COMES NOW Defendant Arkesia, Inc. d/b/a Club Rouge (“Club Rouge”), by and through the undersigned legal counsel, and pursuant to Rule 12(b)(1), Rule 12(b)(6), Rule 12(f), and Rule 23 of the Federal Rules of Civil Procedure, hereby files this Motion to Dismiss and Motion to Strike, and in support of these Motions relies upon the facts and legal contentions set forth in the accompanying Memorandum filed in support, any reply brief which may be filed, and any arguments Defendant may make at the hearing before this Court regarding these Motions.

Dated: February 12, 2018

Respectfully submitted,

ARKESIA, INC. d/b/a CLUB ROUGE,

By: _____ /s/
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CERTIFICATE OF SERVICE

I hereby certify that on February 12th, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Justin P. Keating, Esq.
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Notification of such filing will also be sent via First Class U.S. Mail to:

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LaDonna Lusher, Esq.
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ARKESIA, INC. d/b/a CLUB ROUGE

By: _____ /s/

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